

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

<div>SECURITIES INVESTOR PROTECTION CORPORATION,</div> <div>Plaintiff-Applicant,</div> <div>v.</div> <div>BERNARD L. MADOFF INVESTMENT SECURITIES LLC,</div> <div>Defendant.</div>	Adv. Pro. No. 08-01789 (SMB)
<div>In re:</div> <div>BERNARD L. MADOFF,</div> <div>Debtor.</div>	SIPA LIQUIDATION  (Substantively Consolidated)
<div>IRVING H. PICARD, Trustee for the Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC and Bernard L. Madoff,</div> <div>Plaintiff,</div> <div>v.</div> <div>SAGE ASSOCIATES, <i>et al.</i>,</div> <div>Defendants.</div>	Adv. Pro. No. 10-04362 (SMB)
<div>IRVING H. PICARD, Trustee for the Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC and Bernard L. Madoff,</div> <div>Plaintiff,</div> <div>v.</div> <div>SAGE REALTY, <i>et al.</i>,</div> <div>Defendants.</div>	Adv. Pro. No. 10-04400 (SMB)

**NOTICE OF MOTION AND MOTION TO WITHDRAW THE REFERENCE**

**PLEASE TAKE NOTICE** that Defendants Sage Associates, Sage Realty, Malcolm H. Sage, Martin A. Sage, and Ann M. Sage Passer (“Defendants”), by their undersigned counsel, respectfully move the United States District Court for the Southern District of New York at the

United States Courthouse, 500 Pearl Street, New York, NY 10007, on a date to be determined by the Court, pursuant to 28 U.S.C. § 157(d), Rule 5011 of the Federal Rules of Bankruptcy Procedure, and Rule 5011-1 of the Local Rules for the Southern District of New York, for an Order withdrawing the reference of the above-captioned adversary proceedings from the United States Bankruptcy Court for the Southern District of New York for the reasons set forth in the accompanying Memorandum of Law.

WHEREFORE, Defendants respectfully request that the Court enter an Order granting the relief requested herein, and such other and further relief as the Court deems just and proper.

Dated: November 30, 2020  
New York, New York

McDermott Will & Emery LLP

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*Attorneys for Defendants Sage Associates, Sage  
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Ann M. Sage Passer*

**CERTIFICATE OF SERVICE**

I hereby certify that on November 30, 2020, I caused a true and correct copy of Defendants' Notice of Motion and Motion to Withdraw the Reference to be served upon the parties in this action who receive electronic service through CM/ECF and by electronic mail upon:

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LLC and the Estate of Bernard L. Madoff*

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